



HINSHAW &amp; CULBERTSON LLP

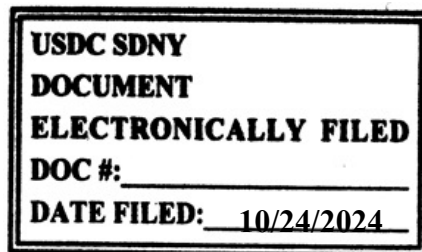
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October 24, 2024

**VIA ECF**Hon. Katharine H. Parker  
Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007**MEMO ENDORSED**Re: Brannigan v. Midland Credit Management, Inc.  
Docket No. 1:24-cv-05999-DEH-KHP

Dear Judge Parker:

We represent Defendant Midland Credit Management, Inc. ("MCM") in the above referenced matter. I write this letter on behalf of both parties jointly seeking an adjournment of the initial case management conference order scheduled for **October 29, 2024 at 3 p.m.** The parties respectfully request this adjournment because the parties have recently had encouraging discussions regarding a potential resolution of this matter and need some additional time to fully explore this option. This is the parties' first adjournment request.

Notably, MCM has not yet filed a response to the complaint and its time to do so presently expires on **October 28, 2024** (Plaintiff sent a copy of the Summons and Complaint by mail which does not constitute proper service but MCM executed and delivered waivers of service on August 29th 2024). With Plaintiff's consent, MCM also respectfully requests a 30-day extension to respond to the complaint in light of the parties' active resolution negotiations and to give MCM time to prepare a proper response in the event the parties do not resolve. This is MCM's first request for an extension of time to respond.

We thank the Court for its consideration of this matter.

**APPLICATION GRANTED:** Defendant's deadline to answer the complaint is hereby extended to **November 27, 2024**. The Initial Case Management Conference scheduled on Tuesday, October 29, 2024 at 3:00 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to **Tuesday, December 3, 2024 at 11:30 a.m.**

**APPLICATION GRANTED****Hon. Katharine H. Parker, U.S.M.J.**Respectfully submitted,  
HINSHAW & CULBERTSON LLP/s/Han Sheng Beh  
Han Sheng Beh